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4 *Interim Co-Lead Consumer Class Counsel*

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 MAXIMILIAN KLEIN, et al.,

14 Consolidated Case No. 3:20-cv-08570-JD

15 Plaintiffs,

16 vs.
17 **DECLARATION OF KEVIN Y. TERUYA IN
18 SUPPORT OF CONSUMER PLAINTIFFS'
19 REPLY IN FURTHER SUPPORT OF
20 MOTION FOR CLASS CERTIFICATION
21 AND APPOINTMENT OF CLASS
22 COUNSEL**

23 META PLATFORMS, INC.,

24 Defendant.

25 This Document Relates To: All Actions

26 The Hon. James Donato

27 Hearing Date: Dec. 14, 2023 at 10:00 a.m.

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1 I, Kevin Y. Teruya, declare:

2 1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I
 3 serve as Interim Co-Lead Consumer Class Counsel for the Consumer Class in this action. I have been
 4 actively involved in this action, am familiar with the proceedings, and have personal knowledge of the
 5 matters stated herein.

6 2. I respectfully submit this declaration in support of Consumer Plaintiffs’ Reply in
 7 Further Support of Motion for Class Certification and Appointment of Class Counsel. Attached to this
 8 declaration are true and correct copies of **Exs. 1–9**, which are documents and deposition transcripts
 9 that Consumer Plaintiffs cite in their Reply. For the Court’s convenience, the relevant portions of the
 10 documents and deposition transcripts have been highlighted and, where applicable, excerpted.¹

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
1	Excerpts of October 29, 2020 Form 10-Q of Facebook, Inc. filed with the Securities and Exchange Commission	No
2	“ <i>Restrictions on Privacy and Exploitation in the Digital Economy: A Market Failure Perspective</i> ,” Nicholas Economides & Ioannis Lianos (Jan. 27, 2021)	No
3	September 1, 2023 Email from Facebook Counsel	No
4	Excerpts from the Deposition Transcript of Dr. Nicholas Economides, taken in <i>Klein v. Meta Platforms</i> on Sept. 14, 2023	Yes
5	Excerpts from the Deposition Transcript of Dr. Joseph Farrell, taken in <i>Klein v. Meta Platforms</i> on Sept. 22, 2023	Yes
6	Excerpts from the Deposition Transcript of Dr. Catherine Tucker, taken in <i>Klein v. Meta Platforms</i> on Sept. 7, 2023	Yes
7	Deposition Transcript of Maximilian Klein, taken in <i>Klein v. Meta Platforms</i> on May 31, 2023	Yes
8	Deposition Transcript of Sarah Grabert, taken in <i>Klein v. Meta Platforms</i> on April 24 and 25, 2023	Yes
9	Deposition Transcript of Rachel Banks Kupcho, taken in <i>Klein v. Meta Platforms</i> on May 22, 2023	Yes

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 28 ¹ Should the Court find it helpful, Consumers can submit any excerpted materials in full.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on this 3rd day of November 2023 in Los Angeles, California.

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5 By /s/ Kevin Y. Teruya

6 Kevin Y. Teruya

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